



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

AG/MPR
F. #2009R01065

*271 Cadman Plaza East
Brooklyn, New York 11201*

July 21, 2017

By Hand and ECF

Michelle A. Gelernt, Esq.
Michael Schneider, Esq.
Edward Zas, Esq.
Federal Defenders of New York
One Pierrepont Plaza, 16th Floor
Brooklyn, NY 11201

Re: United States v. Joaquin Archivaldo Guzman Loera
Criminal Docket No. 09-466 (S-4) (BMC)

Dear Counsel:

Enclosed please find the government's supplemental discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. This production includes material that is marked "Protected Material" and is subject to the terms of the Court's April 3, 2017 Protective Order (see Dkt. No. 57). The government is also producing draft transcripts pursuant to the March 8, 2017 signed stipulation between the parties. This supplements discovery previously provided on March 8, 2017, April 10, 2017, May 5, 2017, and June 7, 2017. The government will continue to produce discovery on an ongoing basis. The government also requests reciprocal discovery from the defendant.

I. The Government's Discovery

Bates-stamped numbers

Description

0000006730-0000008132

Two compact discs (one for the defendant and one for defense counsel) containing: documents related to drug seizures, scientific reports and analysis, drug ledgers, applications and orders, public health records, telephone records

00000008133	Video of the defendant
00000008134	Video related to drug seizure
00000008140	Four videos of drug seizures

The government is producing forty-one videos described below. The videos from each event contain audio and video footage that identifies law enforcement officers and other persons that cannot be redacted. You may view the videos discoverable under Rule 16, by calling a member of the prosecution team to arrange a mutually convenient time to view them at the United States Attorney's Office. These videos contain information subject to the April 3, 2017 Protective Order (see Dkt. No. 57).

<u>Bates-stamped numbers</u>	<u>Description</u>
00000008135	Ten videos from search of a residence controlled by the defendant.
00000008136-00000008142	Thirty-one videos related to various drug seizures and the discovery of an underground tunnel.

The government is also producing color versions of black and white photographs produced in the past three discovery productions. Each color photograph is assigned the same Bates number as the black and white version of the photograph, but the

Bates number for the color version is followed by the letter "A" (e.g., Bates number 000000743A is the color version of the photograph assigned Bates number 000000743).

Very truly yours,

BRIDGET M. ROHDE
ACTING UNITED STATES ATTORNEY
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ARTHUR G. WYATT, CHIEF
Narcotic and Dangerous Drug Section
Criminal Division,
U.S. Department of Justice

OF COUNSEL:

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ACTING UNITED STATES ATTORNEY
Southern District of Florida

Enclosures

cc: Clerk of the Court (BMC) (by ECF) (without enclosures)